

## Early Childhood Council Waiver Request Application

<b>Early Childhood Council Name:</b> Rocky Mountain Early Childhood Council	<b>Date:</b> February 12, 2019
<b>Primary Contact (Name and Position):</b> Stacy Petty, Council Coordinator	<b>Phone:</b> 719-486-7273
<b>Mailing Address:</b> PO Box 338, Glenwood Springs, CO 81602	<b>Email:</b> rmecc@mtnvalley.org

**1. Please cite the rule or regulation (Including rule/regulation number, and specific language of the rule/regulation creating the barrier) for Waiver Request:**

Currently, there is a severe shortage in qualified applicants for open Early Childhood Teacher (ECT) positions. In order to address this current workforce crisis, we are asking that Child Care Centers and Preschools which meet specific criteria (described in section 7 below) be allowed to hire people into the Early Childhood Teacher (ECT) position who are not yet fully qualified, with a grace period of up to 12 months for that ECT to complete all qualifications. We are asking specifically for the 12 month grace period to apply to the italicized sections of the regulation written below:

**7.702.44 A.1:** An early childhood teacher, assigned responsibility for a single group of children and working under the supervision of a director, must be at least eighteen years of age and *must meet at least one of the following qualifications:*

- a) *A Bachelor's degree from a regionally accredited college or university with a major area of study in one of the following areas:*
  - 1) *Early childhood education;*
  - 2) *Elementary education;*
  - 3) *Special education;*
  - 4) *Family and child development;*
  - 5) *Child psychology.*
- b) *A Bachelor's degree from a regionally accredited college or university with a major area of study in any area other than those listed at Section 7.702.54, A, 1, and additional two (2) three-semester hour early childhood education college courses with one course being either introduction to early childhood education or guidance strategies.*
- c) *Current early childhood professional Credential Level III Version 2.0 as determined by the Colorado Department of Education.*
- d) *A 2-year college degree, sixty (60) semester hours, in early childhood education from a regionally accredited college or university, which must include at least two (2) three-semester hour courses, one of which must be either introduction to early childhood education or guidance strategies; and at least six (6) months (910 hours) of satisfactory experience.*

- e) *Completion of twelve (12) semester hours from a regionally accredited college or university, at either a two year, four year or graduate level, in each of the following subject or content areas in early childhood education and one of the three (3) semester hour courses must be either introduction to early childhood education or guidance strategies, plus nine (9) months (1,395 hours) of verified experience in the care and supervision of four (4) or more children less than six (6) years of age who are not related to the individual.*
- f) *Completion of a vocational or occupational education sequence in child growth and development plus twelve (12) months (1,820 hours) of verified experience in the care and supervision of four (4) or more children less than six (6) years of age who are not related to the individual.*
- g) *Current certification as a Child Development Associate (CDA) or other Department-approved credential.*
- h) *Completion of a course of training approved by the Department that includes training and work experience with children in a child growth and development program plus twelve (12) months (1,820 hours) of verified experience in the care and supervision of four (4) or more children less than six (6) years of age who are not related to the individual.*
- i) *Twenty-four (24) months (3,640 hours) of verified experience in the care and supervision of four (4) or more children less than six (6) years of age who are not related to the individual. Satisfactory experience includes being a licensee of a Colorado family child care home; a teacher's aide or teacher in a child care center, preschool, or elementary school, plus either:*
  - 1) *A current Colorado Level I credential; or,*
  - 2) *Two (2) three-semester hour early childhood education college courses from a regionally accredited college or university, at either a two year, four year or graduate level, in each of the following subject or content areas with one course being either introduction to early childhood education or guidance strategies.*

**2. Please list any statute or legislation associated with the rule/regulation cited above:**  
*(Please note: state statutes cannot be waived.)*

Title 26. Human Services Code, Article 1. Child Care Centers, Part 1. Child Care Licensing  
 C.R.S. 26-6-106: Standards for facilities and agencies - rules

(2) Standards prescribed by such rules are restricted to:

- (b) The character, suitability, and qualification of the applicant for a license and of other persons directly responsible for the care and welfare of children served, including whether an affiliate of the licensee has ever been the subject of a negative licensing action;
- (d) The number of individuals or staff required to insure adequate supervision and care of children served

**3. Reason for Request (IN DETAIL - Describe the barrier this Waiver addresses in implementing an early childhood project)**

We do not have an adequate pipeline of qualified Early Childhood Teacher (ECT) applicants to fill open positions in licensed child care center and preschool programs. RMECC conducted



a workforce survey of child care centers and preschools in January and February 2019, and the survey results have confirmed the workforce crisis. As part of the survey, we asked about length of time to fill ECT positions, number of vacant positions, and whether the program had filled positions with unqualified candidates. We also asked about how staffing had affected classrooms and availability of care. Highlights of the survey, which represented 50% of all licensed child care center & preschool programs in the region:

- 72.2% of directors reported difficulty filling ECT positions
  - 33.3% of directors reported it took between 4 and 12 weeks to fill positions, and 22.2% reported it took more than 13 weeks
  - Directors in a total of 36 facilities reported 100 vacant ECT positions in the previous 12 months, with 35 positions still being open at the time of the survey
  - Directors reported that 65 of the ECTs they hired in the prior 12 months were not yet fully qualified
  - Due to difficulty hiring ECTs, in the previous 12 months, directors reported:
    - Classrooms that were closed: 2 infant, 1 toddler and 1 preschool
    - Vacant classrooms that were unable to open: 2 infant, 1 toddler and 3 preschool
    - Classrooms with increased staff/child ratios: 5 infant, 10 toddler and 14 preschool
- NOTE: Although this waiver does not include staffing for infant classrooms, we wanted to include the data to more fully paint a complete picture. It is also worth noting that 50% of our licensed centers participated in this survey due to the quick turnaround time, so we expect the numbers would only increase.*
- Directors reported the following impact due to difficulty with hiring:
  - 80.5% said they spent more time managing staffing patterns
  - 80.5% spent more time filling in the classroom
  - 80.5% said while staff needed increased support, they had less time available to provide that support
  - 80.5% said they spent more time with recruiting/interviewing/training new staff
  - 86.1% said this decreased the time they had available for program planning and for staying informed

Our regional data trends higher than the state-wide findings of *Colorado's Early Childhood Workforce Survey 2017*. *Statewide, the survey showed approximately 70% of directors statewide reported difficulty finding teachers to fill vacant positions and position vacancies took an average of 2.5 months to fill.*

#### **4. Please explain how waiving this rule/regulation is the only available method to implement the early childhood project:**

Although we are continuing efforts locally on other strategies to begin to increase the pipeline of qualified candidates, including dual enrollment and supporting students to earn a CDA, these take time and funding and do not address our immediate crisis.

When a staff person leaves and qualified staff cannot be hired in a timely manner to fill these vacant positions, child care centers are often facing the difficult choice of hiring unqualified applicants, closing classrooms, or increasing staff/child ratios beyond what is desirable for quality. According to the *Colorado Early Childhood Workforce Survey 2017*, 43% of directors indicated that they often have to fill vacant positions with unqualified teachers. The results of our survey show the percentage for our 4 county area is slightly above 80%. Allowing a grace period for high quality programs to fill vacant positions with candidates who are still in the process of completing qualifications will allow these directors to hire the best candidates



while ensuring the new ECT receives the support s/he needs to thrive, with protocols in place to ensure children's safety and well-being. This waiver will also allow programs to grow leaders from within their organization as well.

**5. How will Waiver Approval positively impact children, families, and/or your community?**

Children, families and the community will all benefit from this waiver.

- The lack of adequate staffing in the classroom is negatively impacting children through higher staff/child ratios and through an increase in the number of transitions children are experiencing as programs move children and teachers throughout the day to maintain ratios. By increasing staffing, children will receive more individualized attention and experience more stability of care. This, in turn, positively impacts attachment, which is associated with a wide range of child outcomes (Hamre, B. K., & Pianta, R. C. (2001). Early teacher-child relationships and the trajectory of children's school outcomes through eighth grade. *Child Development*, 72, 625-638).
- This waiver will positively impact teachers by implementing and addressing several of the *Policy and Practice Implications* in the *Colorado Early Childhood Workforce Survey 2017: Findings from Northwest Colorado*, including funding for scholarships, creating and expanded set of higher educational pathways and expanding and tailoring in-service professional development. It is worth noting that all of our Level 3-5 Child Care Centers (n=27) participate in CSQI funding. This will lead to more educated and trained Early Childhood Teachers and increased pay. Increasing teacher job satisfaction ultimately impacts the quality and stability of care for children.
- Lack of staffing is impacting families as the availability of care in our community is decreasing (as demonstrated by the inability to open new classrooms). By increasing staffing, we will begin to see classrooms and programs opening to meet the overwhelming demand for care in our community.
- The lack of staffing ultimately impacts the economic health of our community, as families cannot find the child care they need to be able to work. Increasing staffing is a fundamental underlying cause of this shortage. By increasing staffing, we will ultimately support the broader workforce and employers throughout the region.

**6. Please describe stakeholder outreach. Who are all the affected parties of this Waiver Request? (You may attach letters from affected parties)**

All licensed child care centers and preschools are impacted by the lack of qualified ECT teachers, but eligibility to participate in this waiver is limited to child care centers in the region rated at a Colorado Shines Level of 3 or higher who are in good standing with Child Care Licensing. As of February 2019, 27 programs meet this criteria.

Child care centers have been an integral part of developing this waiver application. The data from RMECC's workforce survey of child care centers demonstrates the need. In October 2018, the RMECC formed a Waiver Committee with representation from 3 centers (including school districts), the ECE Department Chair from the local community college, coaches, county representatives and RMECC staff. We also sought out input from our CPP partners and licensing specialists to make sure we were aware of their concerns in pursuing this application.

This task force met 4 times to develop the survey and review the regulations, determine protocols to ensure quality and safety, discuss how we will evaluate the effectiveness, and develop this waiver request.



The waiver committee, including several programs who are all rated at a Colorado Shines Level 3, 4 or 5, evaluated the protocols you see reflected in this request. Letters of support from four programs are attached.

**7. Do you have any evidence to demonstrate that compliance with the specific rule creates a substantial undue burden? (If so, please attach)**

The results from both RMECC's 2019 regional Workforce Survey and *The Colorado Early Childhood Workforce Survey 2017* has compelling evidence that filling all vacant ECT positions with fully qualified candidates, in a timely manner, is not possible given the lack of qualified candidates. Trying to be in compliance with the regulation 7.702.44 A.1 results in understaffed classrooms, more burden on directors, reduced access to child care for families, and more transitions for children. The data demonstrating this is enumerated in question 3 above.

- **If this rule/regulation is waived, how will you meet its intended purpose? (Ex: diversity of stakeholders, health and safety of children in care, etc.)**

We have carefully considered the safeguards that need to be in place to meet the intended purpose of the regulation. In order to utilize this waiver, the program must have a current Colorado Shines Level 3, 4 or 5 rating and be in good standing with Colorado Child Care Licensing. The program shall sign a program agreement which commits to the following provisions to ensure children's safety and well-being. RMECC shall send this agreement to the Office of Early Childhood for review. In addition to the above criteria, OEC may consider any adverse actions when reviewing the application and providing feedback to RMECC.

- A program shall have no more than two staff members employed as P-ECTs at any one time.
- The Provisional Early Childhood Teacher (P-ECT) must have completed all pre-service and annual mandatory trainings
- The P-ECT must meet one of the following minimum qualifications upon hiring: Assistant ECT, Level 1 Credential or a Bachelor's degree in an unrelated field.
- The program must email the Provisional ECT Application to CDHS upon employment of a P-ECT, so CDHS has a record of this waived position. CDHS will issue a P-ECT letter and email it to the P-ECT and the program within 3 working days. This is for acknowledgement purposes, not for approval.
- The program, in collaboration with the P-ECT, shall create a professional development plan with detailed, attainable steps that show the path to becoming fully ECT qualified within the 12 month waiver period. This plan must be reviewed at least monthly in the supervisory meetings detailed below to ensure the P-ECT is on track to completion, and updated as steps are completed. The director/assistant director shall keep the plan on file (with a copy given to the employee). The plan shall be signed by both the director/assistant director and the P-ECT, and shall be available for licensing to review. The template for this plan is attached.
- The program will prioritize any CSQI dollars received to support P-ECTs with individualized monthly, on-site coaching with credentialed coaches and using evidence-based models. The director and P-ECT will develop coaching goals and determine the number of hours needed to support the applicant. Applicants can also utilize other coaching opportunities in the region.
- If the P-ECT is working with toddlers, the P-ECT must have or complete next available EQIT course (or ECE 111).
- For the first eight weeks, the P-ECT shall have another staff person (minimum of Assistant Teacher qualified) present during all times that would otherwise require a fully qualified ECT.

- For the first eight weeks, the P-ECT will be observed for a minimum of 30 minutes per week by the Director or Assistant Director. These observations must occur at varying times of the day. At least one of these observations shall be 30 uninterrupted minutes in length. After eight weeks, these observations must occur no less frequently than once per month.
- For the first eight weeks, the P-ECT will meet with his/her supervisor for a minimum of 30 minutes/week to reflect, debrief and receive support. After eight weeks, these meetings must occur no less frequently than once per month.
- All observations and supervisory meetings shall be documented on the attached form and this documentation shall be available for licensing to review. Copies of the observation notes shall be provided to the P-ECT.
- The P-ECT must complete all requirements to be fully qualified under 7.702.44 A.1 within 12 months of being hired into that position.

We have included a packet of materials to provide to any program that wants to take advantage of this waiver. These were adapted from the Larimer Early Childhood Council. The attached documentation includes:

- A documentation tracking form
- A professional development plan
- A checklist to track dates/times of observations and supervisory meetings to be used by the director/assistant director working with the P-ECT
- An observation form to be used with the P-ECT.

**8. On what date would you like the Waiver to START?**

Immediately

**9. On what date would you like the Waiver to END?**

We are requesting a three year time frame for this waiver, so that we can evaluate its impact.

**10. Is there a fiscal impact to implementing this Waiver? (Please describe any anticipated financial impact)**

The fiscal impact will be on the child care programs. Because college classes and additional training may be a condition of employment, the Department of Labor requires the employer to cover both the cost of the education/training and pay the employee's time to attend trainings/classes. The child care centers that have been engaged in this dialogue understand this fiscal impact, and are willing to absorb the cost to get high quality, qualified ECTs.

**11. How will you evaluate the effectiveness of this rule/regulation waiver if approved?**

An effective waiver will result in an increased number of qualified ECTs through successful completion of the waiver, as well as reduced child care program staff vacancies.

As part of the agreement to participate in this waiver, programs must agree to share data with RMECC to support an evaluation of the waiver's effectiveness, including:



- # of participants and demographics of participants
- # successfully completing ECT qualifications within waiver period, and licensing option pursued
  - If not completed, reasons why
- On an annual basis, track how many P-ECTs are still employed in early childhood.

RMECC will also collect quantitative and qualitative data from both the employer and employee through a post-participation survey. Questions will include, but not be limited to: costs incurred by employer for training of P-ECT, length of time until hiring, impact on staff vacancy, feedback on the waiver process/forms, etc.

**12. Additional Comments:**

**SIGNED:**

Stacy L Petty

\_\_\_\_\_  
ECC Coordinator Name

Liz Costaldo

\_\_\_\_\_  
Steering Committee Co-Chair Name

\_\_\_\_\_  
ECC Coordinator Signature

\_\_\_\_\_  
Steering Committee Chair Signature

Early Childhood Council Waiver Request  
**Colorado Department of Human Services Written Statement**

Early Childhood Council Name: <b>RMECC</b>	Waiver #: <b>19-01</b>
CDHS Contact (Name and Position): <b>Teresa Ribble; Licensing Supervisor</b>	Phone: <b>(303) 866-4191</b>
Email: <b>teresa.ribble@state.co.us</b>	Date: <b>3/26/19</b>

- **Confirm Rule and Citation: Is the rule on the Application eligible for Waiver Review? (ie. the rule is listed in CCR 2509 and not noted in state statute)**

YES: ☒ NO: ☐

- **Is the correct citation used on the Waiver Application?**

YES: ☒ NO: ☐

*If citation is incorrect, please cite the correct one here:*

- **Implications of Waiver Approval on the health and safety of children (Does approval of this waiver request have anticipated implications on the health & safety of children?):**

CDHS believes this waiver could have some negative implications on children's cognitive and social development during this critical growth period. When adults have little or no early childhood education and/or experience, and have minimal supervision and oversight within a classroom; it becomes a risk for children's social-emotional and academic development. Staff members must and need to use their child development knowledge along with child guidance strategies in order to work appropriately with the children in their care. Additionally, children need to have continuity of care as it is essential to create long-term outcomes for future academic and social success.



- The Department has reviewed this Waiver Request for Health & Safety concerns and has the following comments:

Please see the attached page for the Department's recommendations. The Department requests the recommended requirements be added to the original waiver to address health and safety concerns.

SIGNED:

Teresa Ribble

State Agency Representative Name

Teresa Ribble

State Agency Representative Signature

These recommendations are in addition to the Rocky Mountain ECC waiver documentation submitted to the Department for approval-

1. The P-ECT applicant will submit an application to the Department with verifiable documentation of current qualifications to obtain a P-ECT letter prior to working with children. The letter will expire one year after the date of the application approval. The P-ECT letter will have a revocation clause and may be revoked if substantial evidence has been found that the director is responsible for one or more of the following at any child care facility, including, but not limited to:
  - a. Committing fraud;
  - b. Responsible for egregious or repetitive grounds for negative licensing actions;
  - c. Providing false information;
  - d. Providing false transcripts for self or staff; or,
  - e. Providing false letters of experience for self or staff
2. The license must be in good standing, hold a Level 3-5 rating, and no adverse action within the last 12 months.
3. Rocky Mountain ECC shares all collected data associated to this project with the Department of Early Care and Learning.
4. The participating facilities will communicate any reports, requests, forms, and general waiver information to our Appeals and Waivers email address  
[cdhs\\_childcare\\_appeals@state.co.us](mailto:cdhs_childcare_appeals@state.co.us)
5. Will the participants/applicants involved in this project have some sort of retention time frame or compensation benefits?



**FORM A**

**APPLICATION DATA FORM  
PROVISIONAL - EARLY CHILDHOOD TEACHER**

Full Name \_\_\_\_\_

Maiden Name (and/or other surnames) \_\_\_\_\_

Date of Birth \_\_\_\_\_

\*Social Security Number \_\_\_\_\_

Mailing Address (including zip code) \_\_\_\_\_

(Your letter will be mailed to this address -- Must be the applicant's personal address, not business address)

Home Telephone (    ) \_\_\_\_\_ Cell Telephone (    ) \_\_\_\_\_

\*\*E-mail address \_\_\_\_\_

---

Center where employed \_\_\_\_\_

Center Address (including zip code) \_\_\_\_\_

License Number of Center: \_\_\_\_\_ Current Position: \_\_\_\_\_

---

**I certify that all information pertaining to my application for Provisional - Early Childhood Teacher qualification letter is true and correct. I understand that providing false or misleading information to the Colorado Department of Human Services constitutes perjury in the second degree and can also result in my being fined as much as \$100 a day to a maximum of \$10,000.**

Signature \_\_\_\_\_ Date \_\_\_\_\_

Printed Name: \_\_\_\_\_

---

\* This field is used as a unique identifier in locating information in the Child Care database.

\*\* This area must be filled-out before the application can be accepted as this is our primary means of communication.

**PROVISIONAL - EARLY CHILDHOOD TEACHER QUALIFICATION  
VERIFICATION WORKSHEET**

**Form B**

Name of Applicant: \_\_\_\_\_

QUALIFICATION	VERIFICATION
A. Bachelor's degree from a regionally accredited college/university in a field un-related to ECE	Official Transcript
B. Assistant Early Childhood Teacher qualified per 7.702.44.C	Official transcript Experience verification letter
1. Completion of one of the early childhood education courses in Section 7.702.42, A, with a course grade of "C" or better and twelve (12) months (1820 hours) verified experience in the care and supervision of four (4) or more children less than six (6) years of age, who are not related to the individual. Satisfactory experience includes being a licensee of a family child care home; a teacher's aide in a center, preschool or elementary school. Assistant early childhood teachers must be enrolled in and attending the second (2nd) early childhood education class which will be used as the basis for their qualification for the position of early childhood teacher	
2. Persons having completed two (2) of the early childhood education classes referenced in Section 7.702.42, A, with a course grade of "C" or better and no experience	Official transcript
3. Current Early Childhood Professional Credential Level I, Version 2.0	Current certificate

\* All college course grades toward Early Childhood Teacher qualifications must be "C" or better.

\*\* Expanding Quality in Infant-Toddler Care (EQIT) may be substituted for Infant and Toddler Theory and Practice, and Pyramid Plus training may be substituted for Guidance Strategies, with a verification certificate from the trainer.



## PROVISIONAL - EARLY CHILDHOOD TEACHER QUALIFICATION

## Experience Verification

Each letter must be on employer's letterhead and include:

- ☐ Ages of children worked with
- ☐ Total number of hours worked with each age group
  - Only hours with children birth – 6 years old will be accepted
- ☐ Start date of employment
- ☐ Ending date of employment
- ☐ Position and/or duties related to the care of children birth – 6 years old
- ☐ Employer's signature, name, title, and contact information

Satisfactory experience is the care and supervision of four (4) or more children less than six (6) years of age, who are not related to the applicant. Experience may include being a licensee of a Colorado family child care home, or a teacher's aide or teacher in a child care center, preschool, or elementary school.

***Mail Completed Application Packet to:  
Early Childhood Teacher Qualifications  
CDHS, Division of Early Care and Learning  
1575 Sherman Street, 1<sup>st</sup> Floor  
Denver, CO 80203-1714***



Date: 4-10-19

To: The ECLC Waiver Review Subcommittee

From: The Rocky Mountain Early Childhood Council

RE: Addendum to the Rocky Mountain Early Childhood Council Waiver Application

Thank you to the Waiver Review Subcommittee for the call yesterday. Below I have listed the items we discussed that would be considered an addendum to our original application.

1. Add clarification on the application under Eligibility #2. "with no adverse action within the last 12 months" to match the wording from the CDHS response.
2. On page 10, #3 – update the email from Erin Frederiksen's email to [cdhs\\_childcare\\_appeals@state.co.us](mailto:cdhs_childcare_appeals@state.co.us)
3. On page 10, #9 – add the clarification that observations should occur during active times of the day.
4. On page 10 #8 & #9 – add clarifying wording about Supervisory meetings to include "feedback loops and time for the P-ECT to ask for additional supports as needed".
5. Add on page 11 under Acknowledgements: The RMECC will share all data and submit required reports to the OEC as required.

Please don't hesitate to call or email me with any questions you might have. I look forward to the call on April 25<sup>th</sup> with the Commission. Thank you for your guidance and support through this process.

Regards,

A handwritten signature in blue ink, appearing to read "Stacy Petty".

Stacy Petty, MS  
Council Coordinator  
[rmecc@mtnvalley.org](mailto:rmecc@mtnvalley.org)



## **Early Childhood Council Waiver Request**

### **Recommendation from ECLC Waiver Review Subcommittee**

<b>Early Childhood Council Name:</b> Rocky Mountain Early Childhood Council	<b>Waiver #:</b> 19-01
<b>CDHS Staff:</b> Teresa Ribble and Carin Rosa	<b>Date:</b> 04/09/19
<b>Recommendation to ECLC:</b> Approve the waiver request	

#### **1. Summarize Waiver discussion:**

The waiver #19-01 was requested for approval to create a Provisional- Early Childhood Teacher (P-ECT) qualification. This waiver was requested in order to address the current workforce crisis and allow educators to reach the full ECT qualification more quickly. The Rocky Mountain Early Childhood Council (RMECC) is asking for Child Care Centers and Preschools which meet specific conditions to be allowed to hire people into an Early Childhood Teacher (ECT) position who have certain education or experiences but have not yet met all of the ECT qualifications and allows them a period of up to 12 months to complete all ECT requirements. During this time, the center would provide additional supports, such as enhanced coaching, reflective supervision and classroom observations.

The Waiver Review Subcommittee met on April 9, 2019 at 12:00pm. A representative from Rocky Mountain Early Childhood Council and Colorado Department of Human Services (CDHS) were present. The Subcommittee discussed several clarifications around the waiver application.

#### **2. Recommendation from ECLC Waiver Review Subcommittee:**

ECLC Waiver Review Subcommittee recommends approval of the waiver request for 18 months, with the modifications accounted on the addendum.

RMECC shall provide a status update of the Provisional-Early Childhood Teacher Program after 6 months and 12 months. After the 18 months approval period, the RMECC should provide an additional update on the waiver and the ECLC can determine whether it should be extended.

---

#### **TO BE COMPLETED AT NEXT FULL ECLC MEETING**

<b>Date of ECLC Meeting:</b>
<b>ECLC Waiver Decision and Conditions:</b>